

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NORTH DAKOTA

UNITED STATES OF AMERICA,  Plaintiff,  vs.  WENDI RENAE WELLS,  Defendant.	Cr. No. 1:25-CR-130  DEFENDANT'S MOTION TO CONTINUE TRIAL
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Comes now, Wendi Renae Wells, by and through her attorney, Chief North Dakota Trial Counsel Erin S. Bolinger, and moves the Court for its Order continuing the trial date of July 15, 2025, for 60 days on the following grounds:

In order to properly represent Defendant, the undersigned needs additional time to locate witnesses, to complete the investigation, and to prepare for trial.

The undersigned, further, represents to the Court that this motion is made neither for purposes of undue delay nor other improper reason. Counsel makes this request for the Defendant in order to have the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.

Defendant has been informed and understands that the delay occasioned by this motion is excluded from counting under the Speedy Trial Act.

Dated this 23 day of June, 2025.

Respectfully submitted,

JASON J. TUPMAN  
Federal Public Defender  
By:

/s/ Erin S. Bolinger  
Erin S. Bolinger  
Chief North Dakota Trial Counsel  
Attorney for Defendant  
Office of the Federal Public Defender  
Districts of South Dakota and North Dakota  
100 West Broadway Avenue, Suite 230  
Bismarck, ND 58501  
Telephone: 701-250-4500  
Facsimile: 701-250-4498  
filinguser\_SDND@fd.org